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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	94002611
Party	Registrant Huerta Chemical Corporation
Correspondence Address	OLIVER ALAN RUIZ MALLOY & MALLOY PL 2800 SW 3RD AVENUE MIAMI, FL 33129 UNITED STATES oruiz@malloylaw.com, litigation@malloylaw.com
Submission	Motion to Suspend for Settlement Discussions
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Date	02/03/2015
Attachments	2015 02 03 - Motion to Suspend for Six Months for Settlement Discussions.pdf(98353 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

UNIVERSAL CHEMICAL PRODUCTS
CORP.

Applicant,
vs. Concurrent Use No.: 94002611

HUERTA CHEMICAL CORPORATION,

Registrant,
_____ /

CONSENTED MOTION FOR SIX-MONTH SUSPENSION FOR SETTLEMENT

COMES NOW Huerta Chemical Corporation ("Registrant") and, with the express consent and agreement of counsel for Applicant, Universal Chemical Products ("Applicant"), requests that this proceeding and all pretrial and discovery deadlines be suspended for six (6) months to allow the parties to continue their settlement efforts. The parties have made progress since the last filing seeking a suspension.

It is requested that all pretrial and discovery deadlines be reset as follows:

Time to Answer:	August 4, 2015
Deadline for Discovery Conference:	September 6, 2015
Discovery Opens:	September 6, 2015
Initial Disclosures Due:	October 5, 2015
Expert Disclosures Due:	February 3, 2016
Discovery Close:	March 2, 2016
Plaintiff's Pretrial Disclosures:	April 16, 2016
Plaintiff's 30-day Trial Period Ends:	May 31, 2016
Defendant's Pretrial Disclosures:	June 15, 2016
Defendant's 30-day Trial Period Ends:	July 30, 2016
Plaintiff's Rebuttal Disclosures:	August 14, 2016
Plaintiff's 15-day Rebuttal Period End:	September 13, 2016

WHEREFORE, the Registrant requests that the relief set forth above be granted, and that this proceeding and all pretrial and discovery deadlines be suspended for six (6) months to allow the parties to continue settlement negotiations.

Respectfully submitted,

Dated: February 3, 2015

By: /Oliver Alan Ruiz /
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CERTIFICATE OF FILING

I HEREBY CERTIFY that the foregoing document was filed electronically via the ESTTA, at the United States Patent and Trademark Office, Trademark Trial and Appeal Board, web site, www.uspto.com, this 3rd day of February, 2015.

By: /Oliver Alan Ruiz/
Oliver Alan Ruiz

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served by email and United States Mail, postage pre-paid this 3rd day of February, 2015, upon:

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By: /Oliver Alan Ruiz/
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